

**PRIVILEGED AND CONFIDENTIAL**

**FACT SHEET FOR LOBBYISTS  
ON CIGARETTE INGREDIENTS AND CONSTITUENTS**

- Cigarette "ingredients" are not the same as the "constituents" of cigarette smoke.
  - Ingredients are what go into the product in the manufacturing and processing stages. Constituents are what come out in the smoke when the cigarette is lit.
  - Examples of ingredients include the tobacco itself, humectants such as glycerin (to keep the tobacco moist), sugars and honey, and other flavorings such as vanilla and menthol.
  - Examples of smoke constituents include nicotine, carbon monoxide, and all other things known generically as "tar."
- Ingredients in food may not provide a perfect analogy for ingredients in tobacco.
  - When the cigarette burns, some ingredients never get into the smoker because they are distilled away.
  - Other ingredients reach the smoker in the same form as they went into the cigarette, but in smaller amounts, while others change chemical composition.
  - Because constituents of tobacco smoke are often different compounds than the ingredients that went into the cigarette, knowing what goes into the cigarette does not necessarily tell you what goes into the smoker.
- Comparisons between tobacco ingredients regulation and food ingredients regulation are also imperfect.
  - Ingredients generally recognized as safe ("GRAS") for food are evaluated for safety using feeding, not inhalation, studies. Thus, critics of the industry may challenge our claim that because some ingredients in cigarettes have been approved

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as safe for use in foods, they are presumptively safe when inhaled.

- However, the long history of the safe use of these ingredients in food is at least evidence that the use of the same ingredients in cigarettes, particularly in the minute amounts in which they are used, is unlikely to constitute a serious health concern.
- The Kennedy bill treats ingredients and constituents differently.
  - Constituents are subject only to disclosure requirements. Manufacturers must submit to the Center for Tobacco Products a list of all brands of tobacco products, and for each brand, the levels of constituents (tar, nicotine, carbon monoxide and other constituents, as determined by the Center).
  - Ingredients (or "additives," as the bill labels them) are subject to both disclosure requirements (more detailed than constituents) and safety standards. The Center may prohibit or reduce additives it determines to present "unnecessary increased risks to health." (Note that the broad language used in the bill might permit the Center to burn the additives and then evaluate their safety.)

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